



Eckert Seamans Cherin & Mellott, LLC
10 Bank Street
Suite 700
White Plains, New York 10606

TEL 914 949 2909
FAX 914 949 5424
www.eckertseamans.com

Robert W. Morris
Direct: 914.286.6440
rwmorris@eckertseamans.com

August 12, 2019

Via ECF

The Honorable J. Paul Oetken
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

RE: Dynamics Inc. v. Samsung Electronics Co., Ltd., et al.
Civil Action No.: 19-6479 (JPO-SN)
Our File No.: 308085-00005

Dear Judge Oetken:

We represent Plaintiff, Dynamics Inc. in the above-referenced matter. We have been informed that Gregory S. Arovas of Kirkland & Ellis, LLP will be entering an appearance on behalf of the defendants, Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Research America, Inc. ("Defendants" or "Samsung").

We write on behalf of all parties and with the consent of Samsung to respectfully request a ninety (90) day extension of time for Samsung to file an answer or otherwise respond to the Complaint that was filed on July 12, 2019, in the above-referenced matter. The Complaint was duly served on Samsung Electronics America, Inc. and Samsung Research America, Inc. ("U.S. Defendants") on July 24, 2019. Samsung Electronics Co., Ltd. has agreed to waive service in exchange for Dynamics's agreement to the requested extension.

The current deadline for the U.S. Defendants to answer or otherwise respond to the Complaint is August 14, 2019. The new date for all of the Samsung defendants to answer or respond to the Complaint with the requested 90-day extension would be November 12, 2019 ("New Date").

In addition, the Court should be advised that Dynamics does not oppose a stay of the District Court action pursuant to 28 U.S.C. §1659, including the contract claims set forth in the Complaint.

Hon. Judge Oetken
August 12, 2019
Page 2

This is the first request for an extension of time to file an answer.

Respectfully submitted,

ECKERT SEAMANS CHERIN & MELLOTT, LLC

/s/ Robert W. Morris
Robert W. Morris, Esq.

RWM/al

Cc: Gregory S. Arovas
Kirkland & Ellis LLP
601 Lexington Avenue
New York, NY 10022